

# JacksonLewis

## MEMO ENDORSED.

### VIA ECF

Honorable Ona T. Wang  
 United States Magistrate Judge  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan Courthouse  
 500 Pearl Street, Courtroom 20D  
 New York, NY 10007

Re: *Osbourne v. TCPRNC LLC, et al*, No. 24 Civ. 1369 (JGLC) (OTW)  
(Second Joint Motion for Extension of Time to File Motion to Approve FLSA Settlement)

Dear Judge Wang:

We represent Defendants TCPRNC LLC d/b/a The Plaza Rehab and Nursing Center and Citadel Consulting Group, LLC (collectively, the “Defendants”) in the above referenced matter. Together with Plaintiff Natasha Osbourne (“Plaintiff, and together with Defendants the “Parties”), the Parties jointly request that the March 17, 2025 deadline (ECF No. 52) to submit a proposed settlement agreement for Plaintiff’s Fair Labor Standards Act (“FLSA”) claims for approval be extended three weeks until April 7, 2025.

Since a settlement in principle was reached on January 31, 2025, the Parties have reached full agreement as to the terms of the FLSA settlement but require additional time to fully execute the underlying agreement. This is the Parties’ second request for an extension, with the first request having been granted on February 28, 2025 (ECF Nos. 51-52). Please let us know if the Court has any questions about this request or desires any additional information.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Steven J. Seidenfeld  
 Steven J. Seidenfeld  
 Christian M. Mercado

March 13, 2025

Application GRANTED.

SO ORDERED.

Ona T. Wang  
 U.S.M.J.

Mar. 14, 2025